UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

| UNITED STATES OF AMERICA |) | |
|--------------------------|---|-----------------------|
| |) | |
| v. |) | 3:17-CR-82 |
| |) | Judges Varlan/Shirley |
| RANDALL KEITH BEANE, and |) | |
| HEATHER ANN TUCCI-JARRAF |) | |
| |) | |

UNITED STATES OF AMERICA'S NOTICE OF EXPERT WITNESS TESTIMONY

The United States of America, by and through J. Douglas Overbey, United States

Attorney for the Eastern District of Tennessee, pursuant to Federal Rule of Criminal Procedure

16(a)(1)(e), hereby provides notice of testimony that the United States intends to use at trial in

accordance with Federal Rules of Evidence 702, 703, and 705.

Zachary Scrima of the Federal Bureau of Investigation (FBI) will testify as an expert at trial. Forensic Accountant Scrima is a Certified Public Accountant and has been employed with the FBI since 2010. Forensic Accountant Scrima's resume is attached to this notice.

In his current position, Forensic Accountant Scrima is the Acting Supervisory Forensic Accountant for the FBI's Forensic Accountant Support Team based in the Washington, D.C., Headquarters of the FBI. He has provided expert financial transaction analysis for numerous investigations including, white-collar crimes, international criminal enterprises, and cyber enabled crimes. He has participated in large-scale, multi-jurisdictional investigations and performed forensic accounting services that all parties were able to understand and utilize. Forensic Accountant Scrima has acted as a financial expert in multiple bank fraud investigations and has testified in Federal District Court as an expert in financial transactions.

As a result of this knowledge and his training and experience, Forensic Accountant Scrima will testify about the banking system and the rules and regulations that apply to most of the banking industry and the Federal Reserve.

Forensic Accountant Scrima will not state an opinion about whether the defendants' decisions constituted fraud or money laundering. Federal Rule of Evidence 704(b) precludes such testimony.

J. DOUGLAS OVERBEY UNITED STATES ATTORNEY

By: *s/Cynthia F. Davidson*

ANNE-MARIE SVOLTO
CYNTHIA F. DAVIDSON
Assistant United States Attorneys
800 Market Street, Suite 211
Knoxville, Tennessee 37902
(865) 545-4167

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/Cynthia F. DavidsonCYNTHIA F. DAVIDSONAssistant United States Attorney